

DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1

**FOX ROTHSCHILD LLP**

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*Special Counsel to the Chapter 7 Trustee*

In re:

AHMED A. ZAYAT,  
Debtor.



Order Filed on September 10, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No.: 20-20387 (VFP)

Judge: Hon. Vincent F. Papalia

Chapter: 7

Hearing Date: September 8, 2021  
Hearing Time: 10:00 a.m.

**ORDER COMPELLING ATLANTIC EMPLOYERS INSURANCE COMPANY  
AND FIREMAN'S FUND INSURANCE COMPANY  
TO COMPLY WITH SUBPOENAS FOR RULE 2004 EXAMINATION**

The relief set forth on the following page, numbered two (2), is hereby **ORDERED**.

**DATED: September 10, 2021**

A handwritten signature in black ink, appearing to read "Vincent F. Papalia".  
\_\_\_\_\_  
Honorable Vincent F. Papalia  
United States Bankruptcy Judge

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DEBTOR: Ahmed A. Zayat

CASE NO: 20-20387 (VFP)

CAPTION: **ORDER COMPELLING ATLANTIC EMPLOYERS INSURANCE  
COMPANY AND FIREMAN'S FUND INSURANCE COMPANY TO  
COMPLY WITH SUBPOENAS FOR RULE 2004 EXAMINATION**

**THIS MATTER** having been brought before the Court upon the motion (the “**Motion**”) of Donald V. Biase, chapter 7 trustee (the “**Trustee**”) for the bankruptcy estate of Ahmed A. Zayat (the “**Debtor**”), by and through the Trustee’s special counsel, Fox Rothschild LLP, seeking the entry of an Order pursuant to Federal Rule of Bankruptcy Procedure 2004(c) and 11 U.S.C. § 105(a) compelling Atlantic Employers Insurance Company and Fireman’s Fund Insurance Company to comply with subpoenas (the “**Subpoenas**”) properly issued under Federal Rule of Bankruptcy Procedure 2004; and due notice having been provided; and the Court having considered the papers submitted and the arguments presented; and for good cause shown, it is hereby

**ORDERED** that pursuant to Federal Rule of Bankruptcy Procedure 2004(c), Atlantic Employers Insurance Company and Fireman’s Fund Insurance Company are directed to produce, via electronic mail to Trustee’s special counsel at [jdipasquale@foxrothschild.com](mailto:jdipasquale@foxrothschild.com) (or other such method that is appropriate and consented to by the Trustee’s special counsel), all documents and information requested in the respective Subpoenas served upon them within ten (10) days of entry of this Order; and it is further

**ORDERED** that in the event either Atlantic Employers Insurance Company or Fireman’s Fund Insurance Company fails to timely comply with any of the deadlines set forth in the previous paragraph, the Trustee may seek further relief from the Court, including, but not limited to, seeking entry of an order of contempt and the imposition of sanctions.

In re:  
Ahmed A. Zayat  
Debtor

Case No. 20-20387-VFP  
Chapter 7

## CERTIFICATE OF NOTICE

District/off: 0312-2  
Date Rcvd: Sep 10, 2021

User: admin  
Form ID: pdf903

Page 1 of 3  
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Sep 12, 2021:

Recip ID	Recipient Name and Address
db	+ Ahmed A. Zayat, 598 Warwick Avenue, Teaneck, NJ 07666-2927

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Sep 12, 2021

Signature: /s/Joseph Speetjens

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on September 10, 2021 at the address(es) listed below:

Name	Email Address
Andrew J Mollica	on behalf of Creditor RUDY RODRIGUEZ RACING STABLE INC. jdmol@aol.com
Anthony Sodono, III	on behalf of Mediator Anthony Sodono III asodono@msbnj.com
Arthur Joseph Monaco	on behalf of Plaintiff MGG Investment Group LP ajmonaco@obrienllp.com
Arthur Joseph Monaco	on behalf of Plaintiff MGG Specialty Finance Fund LP ajmonaco@obrienllp.com
Arthur Joseph Monaco	on behalf of Creditor MGG Investment Group LP ajmonaco@obrienllp.com
Arthur Joseph Monaco	on behalf of Plaintiff MGG SF Evergreen Fund LP ajmonaco@obrienllp.com

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Barry J. Roy	on behalf of Defendant Ahmed A. Zayat broy@rltlawfirm.com
Barry J. Roy	on behalf of Debtor Ahmed A. Zayat broy@rltlawfirm.com
Brian W. Hofmeister	on behalf of Plaintiff Donald V Biase bwh@hofmeisterfirm.com j119@ecfcbis.com
Brian W. Hofmeister	on behalf of Trustee Donald V. Biase bwh@hofmeisterfirm.com j119@ecfcbis.com
Clement J Farley	on behalf of Interested Party Jeffrey Thomas Testa cfarley@mccarter.com
Clement J Farley	on behalf of Interested Party Jeffrey T. Testa cfarley@mccarter.com
Donald V. Biase	dbiase4236@gmail.com dbiase@iq7technology.com;dbiase4236@gmail.com;pbellina@outlook.com;ecf.alert+Biase@titlexi.com
Franklin Barbosa, Jr	on behalf of Interested Party Jeffrey T. Testa fbarbosa@mccarter.com
Franklin Barbosa, Jr	on behalf of Interested Party Jeffrey Thomas Testa fbarbosa@mccarter.com
Henry M. Karwowski	on behalf of Defendant Ahmed A. Zayat hkarwowski@rltlawfirm.com
Jay L. Lubetkin	on behalf of Debtor Ahmed A. Zayat jlubetkin@rltlawfirm.com rgaydos@rltlawfirm.com
Jay L. Lubetkin	on behalf of Defendant Ahmed A. Zayat jlubetkin@rltlawfirm.com rgaydos@rltlawfirm.com
Jay L. Lubetkin	on behalf of Attorney Rabinowitz Lubetkin & Tully, LLC jlubetkin@rltlawfirm.com, rgaydos@rltlawfirm.com
Jeffrey A. Cooper	on behalf of Debtor Ahmed A. Zayat jcooper@rltlawfirm.com cooperatty@aol.com;rgaydos@rltlawfirm.com
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Jerrold S. Kulback	on behalf of Creditor Cedarview Opportunities Master Fund LP jkulback@archerlaw.com, chansen@archerlaw.com
John Reklaitis	on behalf of Creditor MGG Investment Group LP jreklaitis@obrienllp.com
John J. Harmon	on behalf of Debtor Ahmed A. Zayat jharmon@rltlawfirm.com johnharmon42@gmail.com;rgaydos@rltlawfirm.com
Jonathan C. Schwalb	on behalf of Creditor Fay Servicing LLC as servicer for GC Asset Trust 2019-RPL1 bankruptcy@friedmanvartolo.com
Joseph A. Caneco	on behalf of Trustee Donald V. Biase jcaneco@foxrothschild.com
Joseph J. DiPasquale	on behalf of Trustee Donald V. Biase Jdipasquale@foxrothschild.com cbrown@foxrothschild.com
Joseph M. Vann	on behalf of Interested Party Benjamin Zayat jvann@ctswlaw.com
Joseph M. Vann	on behalf of Interested Party Joanne Zayat jvann@ctswlaw.com
Joseph M. Vann	on behalf of Interested Party JPZ Holdings LLC jvann@ctswlaw.com
Joseph M. Vann	on behalf of Interested Party Justin Zayat jvann@ctswlaw.com
Joseph M. Vann	

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Total Noticed: 1

on behalf of Defendant Cohen Tauber Spievack & Wagener PC jvann@ctswlaw.com

Joseph M. Vann

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Paul S. Hollander

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Paul S. Hollander

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Paul S. Hollander

on behalf of Plaintiff MGG Investment Group LP phollander@okinhollander.com

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U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 45